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YARMOUTH PORT, MASSACHUSETTS 02675

Admitted in the
District of Columbia Only

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APR 3 1992
FCC MAIL BRANCH

Telephone: (508) 362-4358

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Federal Communications Commission
Office of the Secretary

April 2, 1992

Chief, Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

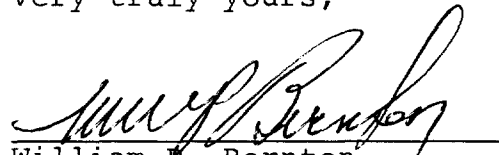
In Re: RM-7900
MM Docket No. 92-23

Dear Sir:

Enclosed herewith are an original and four (4) copies of the Counter-Proposal, Comments and Expression of Interest of Ethel Huff, Petitioner, in the above-referenced matter.

Any correspondence or inquiry in this matter may be directed to the undersigned.

Very truly yours,


William P. Bernton

WPB/nlc
Enclosures

No. of Copies rec'd
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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

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FCC MAIL BRANCH

In the Matter of)
Amendment of Section 73.303(b)) RM-7900
Table of Allocations)
FM Broadcast Stations) MM Docket No. - 92-23
Hazard, Hyden and London, Ken-)
tucky *)
To: The Chief, Mass Media Bureau

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PETITIONER'S COUNTER-PROPOSAL,

Federal Communications Commission
Office of the Secretary

COMMENTS AND

EXPRESSION OF INTEREST

I. Introduction

1. Pursuant to the Petition of Ethel Huff, permittee of Radio Station WYGE(FM), London, Ky ("Petitioner") the Commission, on February 12, 1992, issued a Notice of Proposed Rule-Making contemplating the amendment of Section 73.202(b) of its Rules in the following respects:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>
Hazard, KY	266C, <u>284A</u>	266C, <u>223A</u>
Hyden, KY	<u>222A</u>	<u>284A</u>
London, KY	<u>223A</u> , 280A	<u>222C3</u> , 280A

2. The purpose of Petitioner's proposal was to permit the upgrade of her WYGE(FM) from a Class A to a Class C3 facility.

*The alternative counter-proposal advanced in this pleading would involve changes in the allotments at Hyden, Jackson, and London, KY but not at Hazard.

Accordingly, in its Notice, the Commission proposed to modify the construction permit for WYGE(FM) to specify Channel 222C3 and, in order to make that change possible, issued show cause orders to the licensees of station WJMD(FM), Hazard, KY and WZQQ(FM), Hyden, KY contemplating the change of their assignments from Channel 284A to Channel 223A and from 222A to 284A, respectively.

II. Counter-Proposal

3. Petitioner's Consulting Engineer has, however, developed an alternative "scenario" which would permit WYGE(FM) to upgrade to a Class C2 rather than a Class C3 station on Channel 222. The details of that "scenario" are set forth in the attached Engineering Report of Charles M. Anderson. Under that proposal, Channel 250A, rather than 284A, would be substituted for Channel 222A at Hyden. In order to make Channel 250A available for substitution at Hyden, Channel 249A at Jackson, KY would be replaced by Channel 293A; and it would not be necessary to change the allocation at Hazard, KY.

4. The tabular representation of the allotment changes would be as follows:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>
Hyden, KY	<u>222A</u>	<u>250A</u>
Jackson, KY	<u>249A</u>	<u>293A</u>
London, KY	<u>223A</u> , 280A	<u>222C2</u> , 280A

In implementation of the above changes, WZQQ(FM), Hyden, KY would have to change to Channel 250A rather than 284A and WJMD(FM), Jackson, KY would have to change frequency from Channel 249A to 293A. The substitute channels can be used by those stations at their presently authorized sites. Petitioner agrees to be responsible

for all costs which Commission policy would require it to bear in connection with the WJSN(FM) facility change and would, as with her original proposal, bear those costs relating to the WZQQ(FM) facility change if her agreement with that station's licensee concerning those costs were not implemented. Accordingly, show cause orders directing those changes should be directed to those licensees if this counter-proposal is adopted.

5. The C2 allotment for WYGE(FM) would provide service to almost a quarter of a million persons in over 8,500 square miles, representing increases of 78% in area and 92% in population above those that would have resulted from the C3 upgrade, so the public interest will be that much better served. The service of WJSN(FM) will also be improved since the full 6KW/100 meter equivalent operation it can obtain on Channel 293A is precluded by short-spacing on its present channel. Short spacing also precludes full 6KW/100 meter equivalent operation by WZQQ(FM) at its present assignment, but will be available on Channel 250A as herein proposed, as well as on Channel 284A as proposed in the original petition.

III. Comments and Expression of Interest


6. The Counter-Proposal set forth above is advanced as an alternative to Petitioner's original proposal herein. If it were adopted, Petitioner would apply to have the WYGE(FM) authorization modified to specify Channel 222C2 and would construct the station promptly if that application were granted.

7. Conversely, if the above Counter-Proposal is rejected, Petitioner would still be desirous of having Channel 222C3 allotted to London. To that end, Petitioner here incorporates by reference

her original petition and the Technical Report appended thereto and states her present intention to apply for Channel 222C3 if that channel is allotted to London and to build that facility promptly is that application is granted.

Respectfully submitted,

April 2, 1992

A handwritten signature in cursive script, appearing to read "William P. Bernton", is written over a horizontal line.

William P. Bernton
2 Mill Lane
Yarmouth Port, MA 02675
(508) 362-4358

Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 1992, copies of the foregoing were deposited in the U.S. mails, first class postage prepaid, addressed to:

Joey L. Dick
P.O. Box 181
Stinnett, KY 40868
Licensee of WZQQ(FM)

RECEIVED

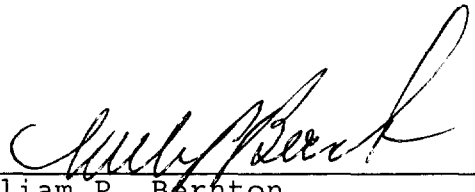
APR 3 1992

Hazard Broadcasting Services
P.O. Box 7001
Hazard, KY 41701
Licensee of WJMD(FM)

FCC MAIL BRANCH

and to

Intermountain Broadcasting Co., Inc.
1024 College Avenue
Jackson, KY 41339
Licensee of WJSN(FM)



William P. Bernton

TECHNICAL REPORT

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APR 3 1992

FCC MAIL BRANCH

ETHEL HUFF

COMMENTS AND COUNTERPROPOSAL

MM DOCKET NUMBER 92-23 (RM-7900)

LONDON, KY

MARCH 25, 1992

CHARLES M. ANDERSON

BROADCAST CONSULTANT

1519 EUCLID AVENUE

BOWLING GREEN, KENTUCKY 42103

(502) 781-2067

TECHNICAL REPORT

Ethel Huff, permittee of radio station WYGE(FM), London, KY, filed a petition for rulemaking requesting the adjacent channel upgrade of WYGE to channel 222C3. The Commission has issued a Notice of Proposed Rulemaking in response to that petition (MM Docket No. 92-23 - RM-7900).

Further technical analysis has produced a more desirable upgrade scenario. Based on Option II presented herein as a counterproposal, WYGE(FM) may attain Class C2 status on channel 222 (92.3 MHz) yielding an even greater gain in service and a more efficient use of the FM spectrum. This technical report has been developed in support of Huff's comments and counterproposal advancing the C2 scenario as a counterproposal and alternative in MM Docket 92-23.

I.

COUNTERPROPOSAL FOR 222C2 UPGRADE AND SUBSTITUTIONS

The alternate scenario (Option II) will permit the adjacent channel upgrade of the London 223A facility to 222C2 with substitutions at Jackson, KY (293A for WJSN's 249A operation) and at Hyden, KY (250A for WZQQ's 222A operation). This alternate upgrade scenario will also provide London, KY with its first wide area service.

Substitution of channels at the licensed sites of the two operating stations in order to effect an upgrade in class for an existing allocation is permitted by the Commission's

allocations rules and policies. In each case the substitution is at the station's licensed site. Furthermore, the substitutions facilitate full 6 kw/ 100 meter class A facilities. Both WJMD and WZQQ are presently limited to 3 kw/ 100 meter operation by shortspacings.

II.

222C2 ADJACENT CHANNEL UPGRADE (OPTION II)

Upgrade of the WYGE facility to 222C2 is proposed at reference point:

N 37-09-12 W 84-06-56 (3.9 km northwest - 315.8 deg.)

An allocation study is submitted as Exhibit E-1 which demonstrates that the 222C2 facility will meet all required clearances at the reference point with the exception of the licensed WZQQ operation for which a substitution is proposed.

Exhibit E-4 demonstrates that there is considerable area within which a London 222C2 facility may be located meeting required separations. The most relevant separations are plotted on the exhibit. It is also evident from Exhibit E-4 that the proposed C2 allocation will provide 70 dBu service to the entire community of London, KY. A terrain and contour analysis is provided as Exhibit E-5. A terrain profile demonstrating line of sight from the allocation reference point to the city reference point is provided as Exhibit E-6. Terrain data was obtained at .1 mile intervals from the

London 7.5 minute topographic quadrangle.

The upgrade of WYGE to 222C2 also qualifies as an adjacent channel upgrade because it is entirely mutually exclusive with the existing authorized facility on 223A. The 106 km spacing required between the proposed C2 facility and the authorized WYGE facility on 223A can not be obtained. Therefore, the new higher class channel will not be subject to competing expressions of interest.

III.

WZQQ 250A SUBSTITUTION

The substitution of 250A for WZQQ's operation on channel 222A is proposed at the station's licensed site (BLH-881121KB) at:

N 37-10-14 W 83-22-49.

Clearly the substituted channel will provide city grade coverage from the station's licensed site. Furthermore, WZQQ will be able to obtain full 6 kw/ 100 meter operation which is presently precluded by a shortspacing providing an additional public interest benefit.

An allocation study is provided as Exhibit E-2 demonstrating that required clearances are obtained. Note that the simultaneous substitution of 250A for 249A at Jackson, KY eliminates the only obstacle to the substitution.

IV.

WJSN 293A SUBSTITUTION

The substitution of 293A for WJSN's (Jackson, KY) operation on channel 249A is proposed at the station's licensed site (BLH-781213AB) at coordinates:

N 37-32-46 W 83-23-42.

The substituted channel will provide city grade coverage from the station's licensed site. Furthermore, WJSN will be able to obtain full 6 kw/ 100 meter equivalent operation presently precluded by a shortspacing, providing an additional public interest benefit. An allocation study is provided as Exhibit E-3 demonstrating that required clearances are obtained.

IV.

AREA AND POPULATION GAINS

The area and population (1990 Census) which would be served by the 222C2 alternative upgrade has been obtained with the Dataworld "Terp", "Contours", and "Popcount" programs for a maximum 50 kw/ 150 meters HAAT facility. The upgraded population and area were compared to the original 222C3 proposal and to the original application for the authorized WYGE facility

A total population of 220,873 and an area of 8,533 square kilometers were determined within the proposed C2 60 dBu. The 222C2 upgrade (OPTION II) will yield a gain in area served of 6,717 sq km compared to the authorized class A

facility (+370%) and a gain of 3,730 sq km over the proposed C3 upgrade (+78%).

The C2 gain in population will be 175,835 (+390%) over the authorized 223A facility, and 105,810 (+92%) over the proposed C3 upgrade. Clearly, the C2 upgrade yields substantially public interest benefits, and is preferred.

IV.

CONCLUSION

The proposed alternate upgrade of WYGE to 222C2 (OPTION II) will also provide London, Kentucky with its first wide area FM service, and effect a substantial increase in population served of 175,835 (+390%) over the authorized Class A facility. Furthermore, the proposed modification of Hyden station WZQQ and Jackson station WJSN will substantially increase each station's service area as a result of the capability of employing full class A 6 kw/ 100 meters facility.

It is concluded that the upgrade of the authorized facility on 223A at London, KY to 222C2 can be accomplished with substitutions at Hyden and Jackson, KY.

Clearly, either the requested C2 or C3 upgrades (OPTION I and OPTION II) is mutually exclusive with the existing authorized facility meeting the Commission's requirements for cochannel and adjacent channel upgrades.

SUMMARY OF ALLOCATION PROPOSALS

OPTION I (ORIGINAL PETITION)

City	Present	Proposed	Coordinates
London, Ky	223A, 280A	222C3, 280A	N 37-03-32 W 84-10-02 (10.7 km @ 224 Deg)
Hyden, KY	222A	284A	N 37-10-14 W 83-22-49 BLH-881121KB licensed site.
Hazard, KY	266C, 284A	266C, 223A	N 37-11-36 W 83-11-04 BLH-890807KB licensed site.

OPTION II (COUNTERPROPOSAL)

City	Present	Proposed	Coordinates
London, Ky	223A, 280A	222C2, 280A	N 37-09-12 W 84-06-56 (3.9 KM @ 315.8 DEG.
Hyden, KY	222A	250A	N 37-10-14 W 83-22-49 BLH-881121KB licensed site.
Jackson, KY	249A	293A	N 37-32-46 W 83-23-42 BLH-781213AB licensed site.

EXHIBIT E-1
222C2 ALLOCATION STUDY

FM Spacing study

Title: WYGE, LONDON, KY UPGRADE
Channel 222C2 (92.3 MHz)
Database: DW 03/17/92

Latitude: 37-09-12
Longitude: 84-06-56
Safety zone: 65 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License		St FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WOAL-FM LIC	ALICE LLOYD COLLEGE	*219A	.90	37-19-45	79.5	111.8	55	
PIPPA PASSES	KY BLED-870105KA	91.7	162	82-52-30	260.3	56.79	CLEAR	
WUOT LIC	UNIVERSITY OF TENNESSEE	*220C	100	36-00-19	172.9	128.4	105	
KNOXVILLE	TN BLED-890201KB	91.9	482BT	83-56-23	353.0	23.36	CLEAR	
Affiliated with WUTK(AM)								
WSCC LIC	SOMERSET COMMUNITY COLLEGE	*221D	.01	37-03-34	256.9	45.65		
SOMERSET	KY BLED-840202AA	92.1	12	84-36-56	76.6			
WMOR-FM LIC	MOREHEAD BROADCASTING CO	221A	3	38-10-53	27.0	128.4	106	
MOREHEAD	KY BLH-790702AC	92.1	91	83-26-55	207.4	22.38	CLEAR	
Affiliated with WMOR(AM)								
WDHR LIC	EAST KY BROADCASTING COR	221A	1.02	37-27-58	75.4	143.0	106	
PIKEVILLE	KY BLH-841015CY	92.1	152	82-33-02	256.4	37.02	CLEAR	
Deletion proposed; ORDERED TO 226C2; Affiliated with WPKE(AM)								
WTKY-FM LIC	WHITTIMORE ENTERPRISES I	221A	3	36-43-27	251.5	147.4	106	
TOMPKINSVILLE	KY	92.1	73	85-40-53	70.6	41.40	CLEAR	
Affiliated with WTKY(AM)								
WTKY-FM CP	WHITTIMORE ENTERPRISES I	221A	6	36-43-27	251.5	147.4	106	
TOMPKINSVILLE	KY BPH-900412ID	92.1	100	85-40-53	70.6	41.40	CLEAR	
CP Granted 11/05/91 per FCC release #21250 dated 11/15/91;								
CP Granted 11/05/91 per FCC release #21250 dated 11/15/91; Application for Lic								
02/18/92; Ant: Elec. Res. Inc. 1105; Affiliated with WTKY(AM)								
WDIC-FM CP	DICKENSON COUNTY BCG COR	221A	2.50	37-08-42	89.8	153.3	106	
CLINCHCO	VA BPH-910830IG	92.1	154	82-23-22	270.9	47.35	CLEAR	
CP Granted 01/13/92 per FCC release #21296 dated 01/17/92;								
CP Granted 01/13/92 per FCC release #21296 dated 01/17/92; Application for Lic								
02/26/92; ORDERED FROM 226A; Call Granted 04/13/89; Ant: Collins LPC-4; Affiliated with WDIC(AM)								
PRM	PROPOSED RULE MAKING	222C3		37-03-32	203.6	11.44	177	
LONDON	KY DOC-92-23	92.3		84-10-02	23.6	-166	SHORT	
PRM adopted 02/05/92, released 02/12/92; SITE RESTRICTION 6.6 MI SW								
WZQQ LIC	JOEY L DICK	222A	2.42	37-10-14	88.1	65.34	166	
HYDEN	KY BLH-881121KB	92.3	111	83-22-49	268.5	-101	SHORT	
Deletion proposed; Call Granted 05/11/88								
WZQQ APP	JOEY L DICK	222A	5.70	37-10-14	88.1	65.34	166	
HYDEN	KY BPH-920122IB	92.3	102	83-22-49	268.5	-101	SHORT	
Received per FCC release #15184 dated 01/31/92,								
accepted per 15186 dated 02/04/92; Call Granted 05/11/88								

EXHIBIT E-1 (CONT)

FM Spacing study

Title: WYGE, LONDON, KY UPGRADE
Channel 222C2 (92.3 MHz)

Latitude: 37-09-12
Longitude: 84-06-56

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
PRM		DELETION PROPOSED	222A		37-10-14	88.1	65.34	166
HYDEN		KY DOC-92-23	92.3		83-22-49	268.5	-101	SHORT
Deletion proposed; PRM adopted 02/05/92, released 02/12/92								
WSAC	LIC	LOUISA COMMUNICATIONS IN	222A	4.48	38-10-33	48.6	173.5	166
LOUISA		KY BLH-910530KA	92.3	115	82-37-39	229.5	7.544	CLOSE
License Granted 01/16/92 per FCC release #21300 dated 01/24/92;								
Call Granted 05/17/90 per FCC release #134 dated 05/18/90;								
Ant: Sys w/Reliabil. FM5								
WDEF-FM LIC	ROY H PARK	BCG OF TENN I	222C	100	35-08-06	206.2	248.9	249
CHATTANOOGA		TN BLH-800128AD	92.3	360	85-19-25	25.4	-.05	SHORT
WYGE	CP	ETHEL HUFF	223A	3	37-08-40	249.5	2.819	106
LONDON		KY BPH-880817MH	92.5	100	84-08-43	69.4	-103	SHORT
Deletion proposed; CP Granted 12/20/90 per FCC release #21017 dated 12/26/90;								
Call Granted 02/22/91 per FCC release #152 dated 02/22/91								
PRM		DELETION PROPOSED	223A		37-08-40	249.5	2.819	106
LONDON		KY DOC-92-23	92.5		84-08-43	69.4	-103	SHORT
Deletion proposed; PRM adopted 02/05/92, released 02/12/92								
PRM		PROPOSED RULE MAKING	223A		37-11-36	86.6	82.81	106
HAZARD		KY DOC-92-23	92.5		83-11-04	267.2	-23.2	SHORT
PRM adopted 02/05/92, released 02/12/92; SITE RESTRICTION 4.2 MI S								
WIMJ	LIC	PATHFINDER COMMUNICATION	223B	16	39-07-19	350.3	221.8	169
CINCINNATI		OH BLH-800424AA	92.5	277	84-32-52	170.1	52.77	CLEAR
Was WWEZ-FM 02/02/92 per FCC release #175 dated 01/31/92;								
Affiliated with WQWQ(AM)								
WMIK-FM LIC	CUMBERLAND GAP	BROADCAST	224A	.13	36-35-50	155.3	67.94	55
MIDDLESBORO		KY BLH-791220AP	92.7	439	83-47-49	335.5	12.94	CLOSE
Affiliated with WMIK(AM)								
WQEG	CP	TWINLAKES COMMUNICATIONS	224A	6	37-00-31	260.9	98.10	55
RUSSELL SPRINGS		KY BPH-900419MT	92.7	100	85-12-14	80.2	43.10	CLEAR
CP Granted 10/25/91 per FCC release #21242 dated 11/04/91;								
WPRX HAS BEEN RESCINDED BY THE COMMISSION;								
Call Granted 12/13/91 per FCC release #173 dated 12/20/91								
WVLK-FM LIC	WVLK RADIO INCORPORATED		225C1	100	38-02-22	345.7	101.6	79
LEXINGTON		KY	92.9	259	84-24-11	165.5	22.57	CLEAR
Affiliated with WVLK(AM)								
WXJJ	CP	WILLIAM S. DAUGHERTY III	275A	2.50	37-21-32	306.9	38.21	15
MOUNT VERNON		KY BPH-860703MF	102.9	106	84-27-40	126.7	23.21	CLEAR
CP Granted 04/30/90 per FCC release #20855 dated 05/11/90;								
Call Granted 07/12/90 per FCC release #138 dated 07/13/90								

EXHIBIT E-1 (CONT.)

FM Spacing study

Title: WYGE, LONDON, KY UPGRADE
Channel 222C2 (92.3 MHz)

Latitude: 37-09-12
Longitude: 84-06-56

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)

WXJJ	APP	WILLIAM S. DAUGHERTY III	275A	3	37-23-29	313.3	38.65	15
MOUNT VERNON		KY BMPH-910606IC	102.9	100	84-26-01	133.1	23.65	CLEAR
Received per FCC release #15018 dated 06/19/91, accepted per 15021 dated 06/24/91; Call Granted 07/12/90 per FCC release #138 dated 07/13/90								

WWXL-FM LIC		WILDERNESS HILLS INCORPO	276A	2.85	37-09-14	89.8	30.23	15
MANCHESTER		KY	103.1	94	83-46-31	270.0	15.23	CLOSE
Affiliated with WWXL(AM)								

WWXL-FM CP		WILDERNESS HILLS INCORPO	276A	2.64	37-09-13	89.8	30.35	15
MANCHESTER		KY BPH-881206IE	103.1	103	83-46-26	270.0	15.35	CLOSE
CP Granted 04/03/89; Affiliated with WWXL(AM)								

>> End of channel 222C2 study <<

EXHIBIT E-2
HYDEN SUBSTITUTION ALLOCATION STUDY

Title: HYDEN — SUB	Latitude: 37-10-14
Channel 250A (97.9 MHz)	Longitude: 83-22-49
Database: DW 03/17/92	Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)

WRLV-FM LIC LICKING VALLEY RADIO COR 247A 5.20 37-45-30 23.0 70.97 31
 SALYERSVILLE KY BLH-910605KB 97.3 103 83-03-52 203.2 39.97 CLEAR
 License Granted 12/27/91 per FCC release #21288 dated 01/03/92;
 Call Granted 09/13/89; Ant: Elec. Res. Inc. LP-3C

WEZK LIC SOUTH CENTRAL BROADCASTI 248C 100 36-00-36 201.1 137.9 95
 KNOXVILLE TN BLH-890928KC 97.5 395BT 83-55-57 20.7 42.94 CLEAR
 License Granted 07/27/90 per FCC release #20918 dated 08/06/90

WJSN-FM LIC INTERMOUNTAIN BCG COMPAN 249A .58 37-32-46 358.2 41.70 72
 JACKSON KY BLH-781213AB 97.7 186 83-23-42 178.2 -30.3 SHORT
 Affiliated with WEKG(AM)

WJSN-FM CP INTERMOUNTAIN BCG COMPAN 249A .64 37-32-46 358.2 41.70 72
 JACKSON KY BMPH-860425IB 97.7 185 83-23-42 178.2 -30.3 SHORT
 CP Granted 09/26/86; CP IS HEREBY FORFEITED 3/18/91; Affiliated with WEKG(AM)

WPEG LIC BCG PARTNERS OF CHARLOTT 250C 80DA 35-21-44 134.6 283.3 226
 CONCORD NC BLH-901207KC 97.9 491BT 81-09-19 315.9 57.27 CLEAR
 License Granted 01/07/92 per FCC release #21294 dated 01/14/92;
 DA: Dielectric DCPB 4/4 @ 0 deg; Affiliated with WGIV(AM)

WKQQ LIC VILLAGE COMMUNICATIONS I 251C1 100 38-02-07 315.9 134.7 133
 LEXINGTON KY BLH-800922AL 98.1 168 84-27-04 135.2 1.732 CLOSE

NEW APP HENSON MEDIA, INCORPORAT 252A 2.61 38-36-19 9.9 161.7 31
 GARRISON KY BPH-910524MB 98.3 150 83-03-37 190.1 130.7 CLEAR
 Received per FCC release #15009 dated 06/06/91,
 tendered per 15030 dated 07/03/91, accepted per NA-149 dated 07/30/91

WTFM LIC HOLSTON VALLEY BROADCAST 253C 100 36-31-36 135.2 100.5 95
 KINGSFORT TN 98.5 384 82-35-14 315.7 5.541 CLOSE
 Affiliated with WKPT(AM)

>> End of channel 250A study <<

EXHIBIT E-3
JACKSON, KY SUBSTITUTION ALLOCATION STUDY

Title: JACKSON — SUB
Channel 293A (106.5 MHz)
Database: DW 03/17/92

Latitude: 37-32-46
Longitude: 83-23-42
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License		St FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)

WGAP-FM LIC		GATEWAY BROADCASTING COR	239A	3	35-49-53	196.6	198.4	10
MARYVILLE		TN BLH-900212KE	95.7	100	84-01-25	16.2	188.4	CLEAR
License Granted 12/21/90 per FCC release #21019 dated 12/31/90;								
Was WYNQ 01/11/90 per FCC release #125 dated 01/12/90								

WRSL-FM LIC		LINCOLN GARRARD BCG COMP	240A	3	37-33-03	270.7	110.5	10
STANFORD		KY	95.9	26	84-38-45	89.9	100.5	CLEAR
Affiliated with WRSL(AM)								

WVYI	CP	MARIANNE WARNOCK	290A	3	37-47-18	283.8	116.5	31
WILMORE		KY BPH-880727NE	105.9	100	84-40-49	103.0	85.54	CLEAR
CP Granted 07/22/91 per FCC release #21173 dated 07/29/91;								
Call Granted 09/06/91 per FCC release #166 dated 09/06/91								

WCYO	LIC	KENTUCKY RIVER BCG CO IN	291A	.67	37-43-12	291.8	52.52	31
IRVINE		KY BLH-910903KC	106.1	199	83-56-54	111.5	21.52	CLEAR
License Granted 01/27/92 per FCC release #21310 dated 02/07/92;								
Call Granted 04/05/91 per FCC release #155 dated 04/05/91;								
Ant: Elec. Res. Inc. FML-1E								

WZKO	LIC	PINE HILLS BROADCASTING	292A	.35	36-45-15	197.5	92.14	72
PINEVILLE		KY	106.3	229	83-42-23	17.3	20.14	CLEAR

WZKO	CP	PINE HILLS BROADCASTING	292A	1.04	36-45-15	197.5	92.14	72
PINEVILLE		KY BPH-901126IB	106.3	234	83-42-23	17.3	20.14	CLEAR
CP Granted 08/19/91 per FCC release #21192 dated 08/26/91								

WNVA-FM LIC		RADIO WISE INCORPORATED	292A	.90	36-57-58	131.8	96.27	72
NORTON		VA BLH-890109KC	106.3	180	82-35-17	312.3	24.27	CLEAR

WNVA-FM CP		RADIO WISE INCORPORATED	292A	1.66	36-57-58	131.8	96.27	72
NORTON		VA BPH-900406ID	106.3	187	82-35-17	312.3	24.27	CLEAR
CP Granted 08/19/91 per FCC release #21192 dated 08/26/91;								
Application for License () accepted per FCC release #15159 dated 12/20/91;								
Ant: Harris								

WFLE-FM CP		FLEMINGSBURG FM BCRS, IN	292A	1.61	38-24-42	350.6	97.41	72
FLEMINGSBURG		KY BPH-910312MG	106.3	137	83-34-41	170.5	25.41	CLEAR
CP Granted 12/03/91 per FCC release #21271 dated 12/10/91;								
Call Granted 01/17/92 per FCC release #174 dated 01/17/92								

EXHIBIT E-3 (CONT.)

FM Spacing study

Title: JACKSON — SUB
Channel 293A (106.5 MHz)

Latitude: 37-32-46
Longitude: 83-23-42

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)

WJDT	LIC	C & S BROADCASTING	293A	.30DA	36-22-51	171.5	130.7	115
ROGERSVILLE		TN BLH-901116KB	106.5	420	83-10-47	351.7	15.73	CLOSE
License Granted 02/27/91 per FCC release #21063 dated 03/05/91;								
Call Granted 04/03/90 per FCC release #131 dated 04/06/90;								
DA: RCA Corporation BFC-1B @ 0 deg; TX: Andrew LDF-5-50A								

WKXO-FM	LIC	BEREA BROADCASTING COMPA	294A	100	37-33-19	271.0	82.83	72
BEREA		KY BLH-901115KA	106.7	100	84-19-56	90.4	10.83	CLOSE
License Granted 08/21/91 per FCC release #21195 dated 08/28/91;								
Call Granted 08/23/90 per FCC release #141 dated 08/24/90								

WVKM	ORD	THREE STATES BROADCASTIN	294C3	18	37-37-01	85.5	108.6	89
MATEWAN		WV BPH-900614IC	106.7	100	82-10-08	266.2	19.59	CLEAR
ORDERED FROM 294A; TDF; Affiliated with WHJC(AM)								

RM		APPLICATION FOR REVIEW	295C2		36-09-41	225.1	216.1	55
MONTEREY		TN RM-5563	106.9		85-05-55	44.0	161.1	CLEAR
Deletion proposed								

WKCB-FM	LIC	HINDMAN BROADCASTING COR	296A	.77	37-19-56	120.9	46.15	31
HINDMAN		KY BLH-870929KA	107.1	198	82-56-52	301.2	15.15	CLOSE
Ant: Continental G5CPM 3-E; Affiliated with WKCB(AM)								

>> End of channel 293A study <<

EXHIBIT E-4

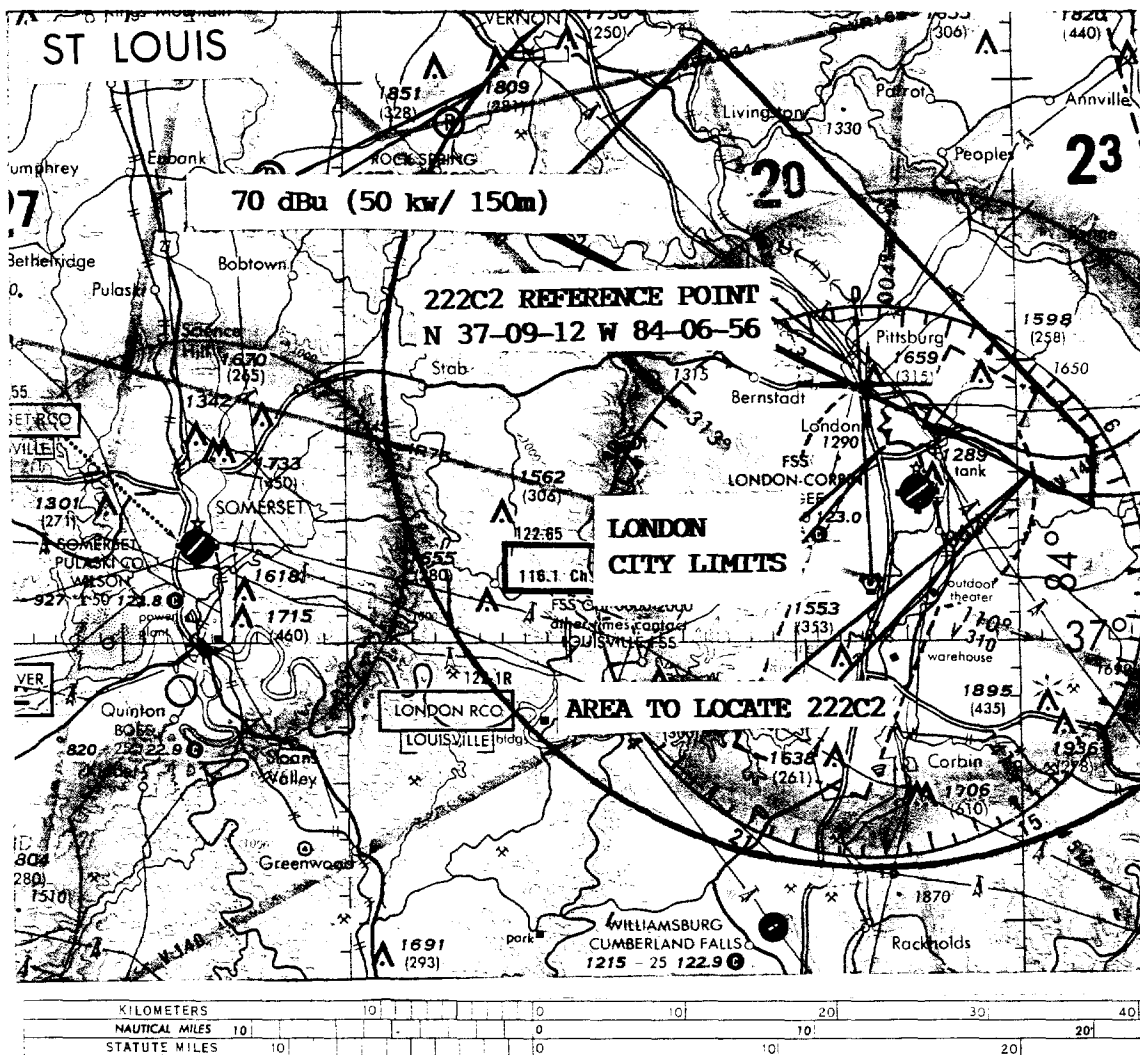


EXHIBIT E-5

222C2 CONTOURS - POPULATION - AREA

Service contours based on FCC F(50,50) curves

Title: LONDON, KY OPTION II

Latitude: 37-09-12

Channel: 222 C/R 503.2 meters (1650.9 feet) A.M.S.L. Longitude: 84-06-56

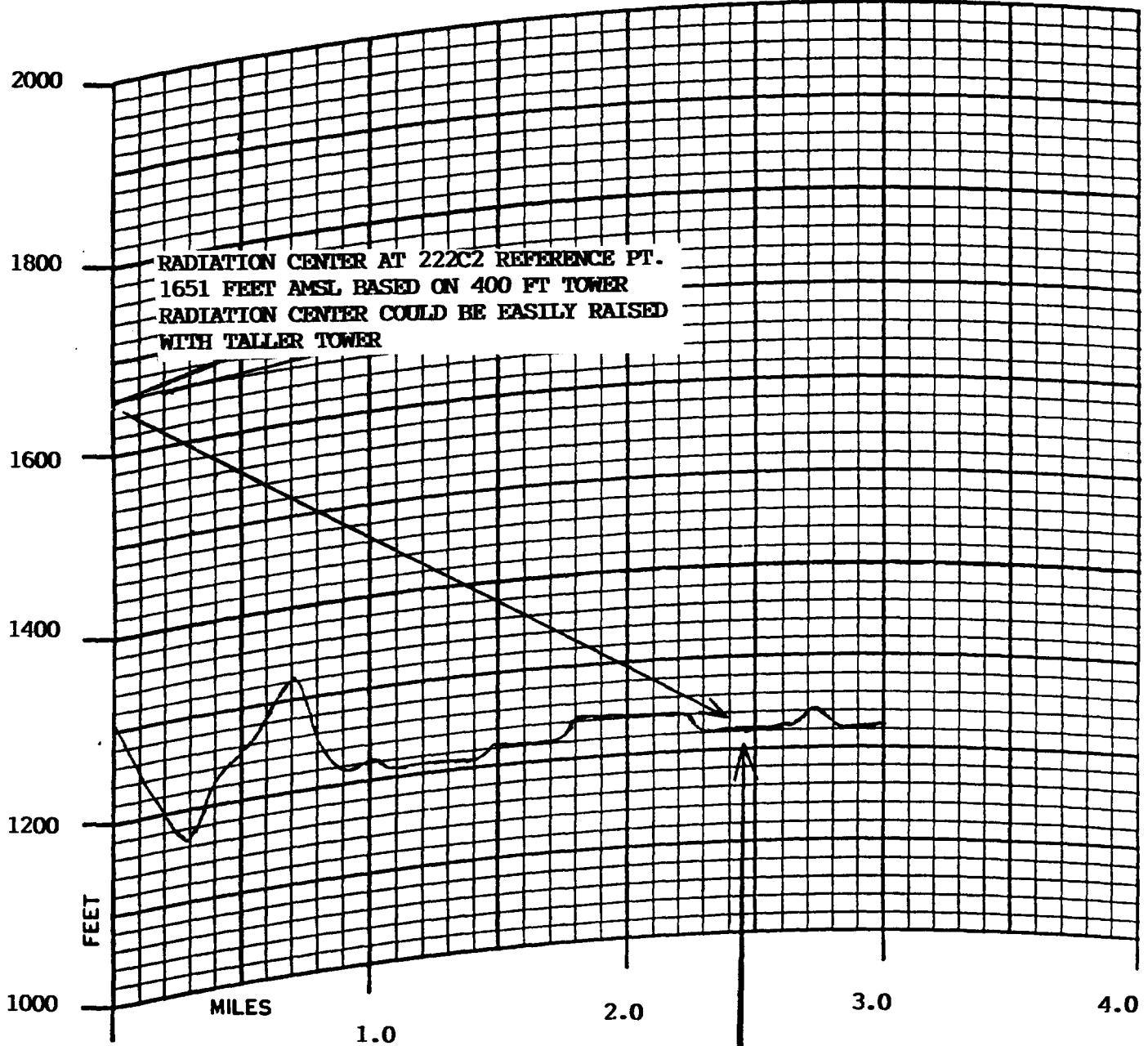
Bearing (degrees)	HAAT (meters) (feet)	ERP (kilowatts) (dBk)	70 dBu (3.16 mV/m) contour	60 dBu (1 mV/m) contour	54 dBu (.50 mV/m) contour
.0	146.8 481.6	50.00 16.99	32.3 km 20.0 mi	51.8 km 32.2 mi	64.6 km 40.2 mi
45.0	155.2 509.2	50.00 16.99	33.2 km 20.6 mi	52.9 km 32.9 mi	65.7 km 40.9 mi
90.0	127.4 418.0	50.00 16.99	30.2 km 18.8 mi	49.0 km 30.5 mi	61.8 km 38.4 mi
135.0	142.2 466.5	50.00 16.99	31.8 km 19.7 mi	51.1 km 31.8 mi	64.0 km 39.8 mi
* 135.8	142.7 468.2	50.00 16.99	31.8 km 19.8 mi	51.2 km 31.8 mi	64.0 km 39.8 mi
180.0	144.0 472.4	50.00 16.99	32.0 km 19.9 mi	51.4 km 31.9 mi	64.2 km 39.9 mi
225.0	163.4 536.1	50.00 16.99	34.1 km 21.2 mi	53.9 km 33.5 mi	66.8 km 41.5 mi
270.0	145.2 476.4	50.00 16.99	32.1 km 19.9 mi	51.6 km 32.0 mi	64.4 km 40.0 mi
315.0	175.8 576.8	50.00 16.99	35.3 km 21.9 mi	55.2 km 34.3 mi	68.1 km 42.3 mi
HAAT:	150.0 492.1				

Note: Radial(s) denoted by "*" not included in HAAT calculation.

60 dBu population count (1990 Census) = 220,873
60 dBu area = 8,533 sq km

EXHIBIT E-6
TERRAIN PLOT - SITE TO LONDON
REFERENCE POINT

BASED ON 4/3 EARTH RADIUS



LONDON REF. POINT
N 37-07-42 W 84-05-06

Terrain from London, KY 7.5 minute
topographic map at .1 mile intervals.

CHARLES M. ANDERSON


CERTIFICATION

Charles M. Anderson hereby certifies that;

His qualifications in broadcast allocation matters are a matter of record before the Federal Communications Commission having been presented and accepted on many occasions in the past;

That he holds a lifetime General Radiotelephone license(#PG-6-7352) , a bachelors degree in the physical sciences from Western Kentucky University and advanced degrees in the communications field from the University of North Carolina and Indiana University;

That the accompanying technical report and exhibits were developed by him personally or under his immediate supervision and that all the information presented therein is true and correct to the best of his knowledge and belief.

/s/ 
Charles M. Anderson

March 25, 1992

Disclaimer: Charles M. Anderson assumes no liability for any errors or omissions in the information, exhibits and report provided herein; and, shall not be liable for any injuries or damages (including consequential) which might result from use of said information, exhibits and report.

Filing of this report with the Federal Communications Commission constitutes acceptance in full of the terms and conditions stated above.

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